1 **HOUSTON WATSON P.C. HOUSTON WATSON II (SBN 163703)** 2501 S. El Camino Real Suite 101 3 San Clemente CA 92672 Phone (562)294-9694 4 Email: houston@houstonwatsonlaw.com 5 Attorneys for Defendant JOHN DOE subscriber assigned 6 IP address 172.90.110.132 7 8 9 UNITED STATES DISTRICT COURT 10 CENTRAL DISTRICT OF CALIFORNIA 11 12 STRIKE 3 HOLDINGS, LLC, Case No.: 8:22-cv-01352-TJH-SP Plaintiff. 13 **DEFENDANT'S REPLY TO** VS. 14 PLAINTIFF'S OPPOSITION TO JOHN DOE subscriber assigned IP **DEFENDANTS MOTION TO** 15 address 172.90.110.132. QUASH 16 Defendants. 17 Action Filed July 21, 2022 18 19 20 TO THE COURT AND THE PLAINTIFF AND ITS ATTORNEYS OF RECORD: 21 Defendant John Doe subscriber assigned IP address 172.90.110.132 ("John 22 Doe") files this Reply (the "Reply") to Plaintiff's Opposition to John Doe's Motion 23 to Quash subpoena (the "Opposition"). Plaintiff's counsel is correct on one point 24 raised in his Opposition. Despite my paralegal inadvertently attaching a copy of the 25 letter from the cable company informing John Doe of the subpoena to the exhibit 26 filed in connection with this Motion, the fact remains that it is was fault and 27 responsibility of counsel for John Doe to ensure that John Doe's identity was not 28

disclosed. John Doe played no part in the inadvertent disclosure. Accordingly, John Doe would respectfully request that should this Court grant this Motion, it strike the first page of Exhibit A to this Motion *which sets forth the name of a renter who currently resides at the property.* Likewise, in the event that this Court denies the Motion, John Doe respectfully requests that this Court strike the first page of Exhibit A to this Motion as well as enter appropriate protective orders to ensure the protection of the identity and the address of John Doe.

As far as the personal attacks levelled at counsel by opposing counsel, counsel for John Doe refuses to be drawn into such unprofessional conduct and notes that despite the fact that the motion to quash may have been denied the cases identified by Plaintiff's counsel, the facts here are significantly different and this Court is well aware of the "Soprano's like" litigation tactics employed by the Plaintiff in these cases.

Accordingly, John Doe respectfully requests this Court grant the Motion.

Dated: November 11, 2022

By: /s/ Houston Watson HOUSTON WATSON

Attorney for Defendants JOHN DOE subscriber assigned IP address 172.90.110.132

## **CERTIFICATE OF SERVICE**

I certify that on November 10, 2022, I electronically filed the foregoing document and that it is available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Houston Watson